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IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF OREGON

UNITED STATES OF AMERICA, )  
Plaintiff, ) No. 3:20-cr-00332-SI-1  
vs. )  
EDWARD WILLIAM CARUBIS, )  
Defendant. )  
 )  
 ) **DECLARATION IN SUPPORT OF**  
 ) **UNOPPOSED MOTION**  
 ) **TO CONTINUE TRIAL DATE AND**  
 ) **WAIVER OF SPEEDY TRIAL**  
 )  
 )

I, Lisa J. Ludwig, declare the following to be true to the best of my knowledge:

1. On August 3, 2020 I was retained as counsel, relieving Assistant Federal Public Defender Bryan Francesconi for Defendant, Edward Carubis in this prosecution;
2. I make this Declaration in support of the attached Unopposed Motion to Continue Trial Date and Waiver of Speedy Trial;
3. The current trial date is April 20, 2021;
4. Mr. Edward Carubis is charged with one count of Assault on a Federal Officer, in violation of Title 18, United States Code, Section 111(a), a Class A misdemeanor;
5. Mr. Edward Carubis is currently out custody pending a resolution of this matter;
6. A continuance of the current trial date for approximately 60 days is necessary to provide the defense with adequate time to complete discovery review; to conduct

independent investigation, including witness interviews and document retrieval; to prepare for trial; and otherwise complete preparations for Mr. Carubis defense;

7. This is the fourth motion to reset the trial date filed in this case on behalf of current counsel;

8. I have contacted AUSA Christopher Cardani and on behalf of the government he does not oppose this requested continuance;

9. I have discussed the proposed continuance and the reasons therefore with my client and he agrees to the requested continuance and consents to a finding of excludable delay for purposes of the Speedy Trial Act between February 16, 2021, and the next date selected for trial;

10. Mr. Carubis has been advised by undersigned counsel of his right to speedy trial under 18 U.S.C. § 3161(h)(7)(A) and the Sixth Amendment to the United States Constitution. Mr. Carubis waives his right to speedy trial in this case 3:20-cr-00332-SI-1 and understands the court will find excludable delay to under the Speedy Trial Act between April 20, 2021, and the next date selected for trial pursuant to Title 18, United States Code, Section 3161(h)(7)(A).

I declare under penalty of perjury that the forgoing is correct to the best of my knowledge and belief.

RESPECTFULLY SUBMITTED this 8th day of April 2021.

/s/ Lisa J. Ludwig  
Lisa J. Ludwig, OSB #953387  
Attorney for the Defendant